

1 Scott E. Gizer, Esq., Nevada Bar No. 12216  
2 *sgizer@earlysullivan.com*  
3 Sophia S. Lau, Esq., Nevada Bar No. 13365  
4 *slau@earlysullivan.com*  
5 EARLY SULLIVAN WRIGHT  
6 GIZER & McRAE LLP  
7 8716 Spanish Ridge Avenue, Suite 105  
8 Las Vegas, Nevada 89148  
9 Telephone: (702) 331-7593  
10 Facsimile: (702) 331-1652

11 Attorneys for Defendant  
12 OLD REPUBLIC NATIONAL TITLE INSURANCE  
13 COMPANY

14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 DEUTSCHE BANK NATIONAL TRUST  
17 COMPANY, AS INDENTURE TRUSTEE  
18 UNDER THE INDENTURE RELATING TO  
19 IMH ASSETS CORP., COLLATERALIZED  
20 ASSET-BACKED BONDS, SERIES 2005-7,

21 Plaintiff,

22 vs.

23 OLD REPUBLIC TITLE INSURANCE  
24 GROUP, INC., et al.,

25 Defendants.

Case No.: 2:20-cv-02009-GMN-DJA

**STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
OLD REPUBLIC NATIONAL TITLE  
INSURANCE COMPANY'S TIME TO  
RESPOND TO DEUTSCHE BANK'S  
OPPOSITION TO OLD REPUBLIC  
NATIONAL TITLE INSURANCE  
COMPANY'S MOTION TO DISMISS  
[ECF No. 30]**

**(First Request)**

COMES NOW Defendant Old Republic National Title Insurance Company (“Old Republic”) and Plaintiff Deutsche Bank National Trust Company, as Indenture Trustee Under the Indenture Relating to IMH Assets Corp., Collateralized Asset-Backed Bonds, Series 2005-7 (“Deutsche Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On December 10, 2020, Old Republic filed a Motion to Dismiss [ECF No. 15];
2. On March 18, 2021, Deutsche Bank filed its response in opposition to Old Republic’s motion to dismiss [ECF No. 30];
3. Old Republic’s deadline to file its reply memorandum responsive to Deutsche Bank’s opposition to Old Republic’s motion to dismiss is currently March 25, 2021;
4. Old Republic’s counsel is requesting a brief extension of time to file the aforementioned reply memorandum, through and including April 8, 2021, to afford Old Republic’s counsel additional time to review, analyze, and respond to the legal arguments set forth in Deutsche Bank’s brief;
5. Deutsche Bank does not oppose the requested extension;
6. This is the first request for an extension which is made in good faith and not for purposes of delay;

///

///

///

///

///

///

///

///

///

///

///

1           **IT IS SO STIPULATED** that Old Republic's deadline to respond to Deutsche Bank's  
2 opposition to Old Republic's motion to dismiss [ECF No. 30] is hereby extended through and  
3 including April 8, 2021.

4  
5 Dated: March 23, 2021

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

6  
7 By: /s/-- Sophia S. Lau  
8 SCOTT E. GIZER  
9 SOPHIA S. LAU  
Attorneys for Defendant OLD REPUBLIC  
NATIONAL TITLE INSURANCE COMPANY

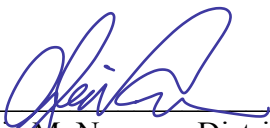
10  
11 Dated: March 23, 2021

WRIGHT FINLAY & ZAK, LLP

12 By: /s/-Lindsay D. Robbins  
13 DARREN T. BRENNER  
14 LINDSAY D. ROBBINS  
Attorneys for Plaintiff DEUTSCHE BANK  
NATIONAL TRUST COMPANY

15  
16 **IT IS SO ORDERED.**

17 Dated this 23 day of March, 2021

18  
19  
20   
21 Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT

**CERTIFICATE OF SERVICE**

I hereby certify that on March 23, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN  
An Employee of EARLY SULLIVAN  
WRIGHT GIZER & McRAE LLP

